

Sandra A. Edwards (SBN: 154578)
sedwards@winston.com
Dana L. Cook-Milligan (SBN: 301340)
dlcook@winston.com
WINSTON & STRAWN LLP
101 California Street, 34th Floor
San Francisco, CA 94111-5840
Telephone: (415) 591-1000
Facsimile: (415) 591-1400

Matthew Righetti (SBN: 121012)
matt@righettilaw.com
RIGHETTI GLUGOSKI, P.C.
The Presidio of San Francisco
220 Halleck Street, Suite 220
San Francisco, CA 94129
Tel: (415) 983-0900
Fax: (415) 397-9005

COUNSEL FOR PLAINTIFF AMY WYNNE

Sean G. Wieber (admitted *pro hac vice*)
swieber@winston.com
Kevin Simpson (admitted *pro hac vice*)
kpsimpson@winston.com
James W. Randall (admitted *pro hac vice*)
jwrandall@winston.com
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601-9703
Telephone: (312) 558-5600
Facsimile: (312) 558-5700

Attorneys for Defendant
SANCTUS LLC d/b/a SHIFT DIGITAL

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AMY WYNNE, individually and on behalf
of a class of similarly situated persons,

Plaintiff,

v.

AUDI OF AMERICA, AUDI OF
AMERICA, LLC, SANCTUS LLC, DBA
SHIFT DIGITAL, SHIFT DIGITAL LLC,
VOLKSWAGEN GROUP OF AMERICA,
INC. and DOES 1-50 inclusive,

Defendants.

Case No. 4:21-cv-08518-DMR

**STIPULATION, PER CIVIL L.R. 6-2, TO
ADJUST BRIEFING SCHEDULE AND
HEARING FOR PLAINTIFF'S MOTION TO
REMAND; ORDER**

1 Plaintiff Amy Wynne (“Plaintiff”) and Defendant Sanctus LLC d/b/a Shift Digital (“Shift
2 Digital”) (collectively, the “Parties”) hereby stipulate as follows:

3 WHEREAS, Plaintiff filed a motion to remand this action on December 1, 2021 (Dkt. 19);

4 WHEREAS, the Court issued a briefing schedule for the motion to remand, wherein opposition
5 was due on December 15, 2021, and reply was due on December 22, 2021 (Dkt. 20);

6 WHEREAS, at Defendant Shift Digital’s request, the Parties stipulated and filed a proposed
7 order to extend deadlines related to Plaintiff’s motion to remand (Dkt. 22);

8 WHEREAS, the Court granted this order and issued a modified briefing schedule (Dkt. 27);

9 WHEREAS, Shift Digital filed its opposition to Plaintiff’s motion to remand on January 12,
10 2022 (Dkt. 40). No other party filed an opposition to Plaintiff’s motion;

11 WHEREAS, Plaintiff’s deadline for the reply for the motion to remand is set for January 26,
12 2022, and the hearing for the motion to remand is set for February 10, 2022, at 1:00 p.m.;

13 WHEREAS, in light of scheduling issues that have arisen for the Parties, the Parties have
14 agreed to: (1) extend Plaintiff’s deadline for the reply for the motion to remand by two weeks, up to
15 and including February 9, 2022, and (2) reschedule the hearing by two weeks, to February 24, 2022,
16 at 1:00 p.m., or for a date convenient to the Court’s calendar;

17 WHEREAS, the Parties believe that the foregoing facts constitute good cause for enlargement
18 of time for Plaintiff’s reply and to reschedule the hearing for the motion to remand;

19 AND WHEREAS, no other case deadlines would be affected by granting the relief requested
20 herein;

21 THEREFORE, IT IS HEREBY STIPULATED that the Parties have agreed to the following:

- 22 • Plaintiff’s deadline for the reply for the motion to remand is rescheduled for February 9,
23 2022, and
- 24 • The hearing for the motion to remand this action is rescheduled for February 24, 2022, at
25 1:00 p.m., or for a date convenient to the Court’s calendar.

26 **IT IS SO STIPULATED AND AGREED.**

27

28

1 Dated: January 25, 2022

RIGHETTI GLUGOSKI, P.C.

2
3 By: /s/ Matthew Righetti

4 Matthew Righetti (SBN: 121012)
5 matt@righettilaw.com
6 RIGHETTI GLUGOSKI, P.C.
7 The Presidio of San Francisco
8 220 Halleck Street, Suite 220
9 San Francisco, CA 94129
10 Tel: (415) 983-0900
11 Fax: (415) 397-9005

12 *Counsel for Plaintiff Amy Wynne*

13
14 Dated: January 25, 2022

WINSTON & STRAWN LLP

15 By: /s/ Kevin Simpson

16 Sandra A. Edwards (SBN: 154578)
17 sedwards@winston.com
18 Dana L. Cook-Milligan (SBN: 301340)
19 dlcook@winston.com
20 WINSTON & STRAWN LLP

21 101 California Street, 34th Floor
22 San Francisco, CA 94111-5840
23 Tel: (415) 591-1000
24 Fax: (415) 591-1400

25 Sean G. Wieber (admitted *pro hac vice*)
26 swieber@winston.com
27 Kevin Simpson (admitted *pro hac vice*)
28 kpsimpson@winston.com
James W. Randall (admitted *pro hac vice*)
jwrandall@winston.com
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601-9703
Tel: (312) 558-5600
Fax: (312) 558-5700

Counsel for Defendant
SANCTUS LLC d/b/a SHIFT DIGITAL

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-l(i)(3)

Pursuant to Civil Local Rule 5-l(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the signatories above.

By: /s/ Dana Cook-Milligan
Dana L. Cook-Milligan (SBN: 301340)

ORDER

Pursuant to the Stipulation and good cause appearing, it is ordered that:

- Plaintiff's deadline for the reply for the motion to remand is rescheduled for February 9, 2022, and
- The hearing for the motion to remand this action is rescheduled for February 24, 2022 at 1:00 p.m. in Oakland - videoconference only.

Dated: January 26, 2022

